

BARRACK, RODOS & BACINE

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Health & Welfare Fund*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF SHEET METAL WORKERS'
LOCAL #19 HEALTH & WELFARE FUND
TO SECURITIES LEAD PLAINTIFF'S
OBJECTION TO REORGANIZED
DEBTORS' MOTION TO APPROVE
SECURITIES ADR AND RELATED
PROCEDURES FOR RESOLVING
SUBORDINATED SECURITIES CLAIMS
[D.I. 9189]**

1 Sheet Metal Workers' Local #19 Health & Welfare Fund, the holder of a Securities
2 Claim¹ and a creditor in the chapter 11 bankruptcy cases (the "**Chapter 11 Cases**") of the above-
3 captioned reorganized debtors (the "**Debtors**", or as reorganized pursuant to the Plan, the
4 "**Reorganized Debtors**"), by and through its undersigned counsel, submits this joinder
5 ("**Joinder**") to *Securities Lead Plaintiff's Objection to Reorganized Debtors' Motion to Approve*
6 *Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket
7 No. 9189] (the "**Securities ADR Objection**"), in opposition to *Reorganized Debtors' Motion to*
8 *Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims*
9 [Docket No. 8964] (the "**Securities ADR Motion**"). In support of this Joinder, Sheet Metal
10 Workers' Local #19 Health & Welfare Fund, respectfully states as follows:

11 **JOINDER AND RESERVATION OF RIGHTS**

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13 1. Sheet Metal Workers' Local #19 Health & Welfare Fund is a Securities Claimant
14 and timely filed proofs of claim against the Debtors by the Extended Bar Date (Claim Nos.
15 ML!ET27423 and BBXS@27423).

16 2. Sheet Metal Workers' Local #19 Health & Welfare Fund incorporates by reference
17 and hereby joins in all arguments set forth in the Securities ADR Objection.

18 3. Sheet Metal Workers' Local #19 Health & Welfare Fund reserves its right to
19 supplement this Joinder and further reserves its rights to participate in any hearing to consider
20 the Securities ADR Motion, including its rights to make any arguments and to examine
21 witnesses.

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26 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as
28 applicable.

1 **CONCLUSION**

2 For all of the foregoing reasons, Sheet Metal Workers' Local #19 Health & Welfare Fund
3 respectfully requests that this Court enter an Order denying the Securities ADR Motion and
4 granting such other and further relief as may be just and proper.
5

6 Dated: October 6, 2020

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8 By: /s/ Samuel M. Ward

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